

March 13, 2014

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, S.W.
Washington, D.C. 20554
Attn: Wireline Competition Bureau

Re: WC Docket No. 10-90
Rural Broadband Experiment Expression of Interest

Dear Ms. Dortch:

Background Information

Callaway Electric (Callaway), Consolidated Electric (Consolidated) and Kingdom Technology Services Inc. (KTIS) collaboratively are seeking ways to improve broadband service available in Central Missouri. Callaway and Consolidated are electric cooperatives operating in adjacent service areas while KTIS is a wholly owned subsidiary of Kingdom Telephone Company, a Rate of Return (RoR) telephone cooperative whose operating area is encompassed by Callaway.

KTIS is the non-regulated broadband subsidiary of Kingdom Telephone Company serving Broadband throughout seven exchanges in Callaway and Montgomery counties, and also offers fixed wireless Internet service outside the telephone exchange area. A trusted communications leader since 1954, Kingdom provides state-of-the art technology, bringing the world a little closer to home by offering broadband services over FTTH and short loop copper broadband facilities.

KTIS is submitting this Expression of Interest as an existing broadband service provider in support of the combined and individual Expressions of Interest filed by Callaway Electric and Consolidated Electric.

Proposed Service Area Identification

The collaborative serving area of Callaway, Consolidated, and Kingdom comprises 6,900 Census Blocks within 23 Census tracts in Central Missouri. The combined operating areas in central Missouri encompass 2,447 square miles. All collaborators are dedicated to serving their customers and actively seek opportunities to improve the quality of life of subscribers in their service areas.

Census Tract Areas:

Callaway County	Montgomery County	Audrain County	Pike County	Monroe County
29027070100	29139970100	29007950100	29163460300	29137960100
29027070200	29139970200	29007950200		29137960200
29027070300	29139970300	29007950300		29137960300
29027070400	29139970400	29007950400		
29027070500		29007950500		
29027070600		29007950600		
29027070700		29007950700		
29027070800				

Community Anchor Institutions

City Government = 9	County Law Enforcement = 2	Municipal Law Enforcement = 7
County Government = 5	911 PSAP = 3	Colleges = 2
Health Dept. = 3	Hospitals = 2	Clinics = 3
Schools = 16	Libraries = 5	U.S. Govt. Offices = 2
Senior Citizen Center = 1	Senior Housing = 1	Elder Care = 3
Fire Districts = 14	Dept. of Family Services = 2	Municipal Govt. = 9
Community Agency = 4	Community Center = 1	

Broadband Technology

KTIS is a Broadband service provider providing broadband services over the existing broadband network of Kingdom Telephone. Kingdom Telephone is an Eligible Telecommunications Carrier (ETC) and has made broadband investments since 2001 in their Rate of Return (RoR) service area and most recently has made additional investments in broadband by systematically upgrading the network in their RoR area to a Gigabit Ethernet FTTH network.

FTTH fiber facilities are proposed as the broadband platform in the electric serving areas of Callaway and Consolidated Electric which are unserved with broadband at the minimum rate of 3Mb/768kbps. The network would be capable of delivering high capacity broadband services over a 2.4 GPON FTTH platform with migration to a 10Gig PON network as well as 1 GigE broadband service as required by business and anchor institutions.

As an existing provider of Voice, Video and Data services, Kingdom Telephone along with the contiguous operating territories of Callaway and Consolidated Electric allows for a seamless integration of technology and operating territories.

Proposed Broadband Service Offerings

Subscriber services contemplated at this time are representative of consumer comments and existing demand for high quality VoIP voice service, high capacity broadband service and support as well as innovative and cost effective video content solutions. KTIS is an existing provider of broadband service and support; high quality voice services are easily accomplished from switching capacity available from Kingdom Telephone operations. Advanced video services can be provided by Kingdom Telephone using the Skitter TV platform.

Exact service packages and profiles are not determined but may be similar to:

Voice – Unlimited or measured local and long distance service

Video – Skitter TV + Consumer provided OTT solutions

Data – Symmetrical 10/10Mb, 20/20Mb, 50/50Mb, 100/100Mb, 1 GigE solutions

Pricing is undetermined at this point in time.

Additional Participation by State, Local and Tribal Governments

Callaway, Consolidated and KTIS thru their involvement with customers and the community continues to see the need for better broadband facilities.

As existing utilities the collaborative group has access to Right of Way thru existing easements and utility accommodations; easing some requirements for Environmental review and allowing for a quicker ramp up for construction of the network.

Funding Commitment

The collaborative group of Callaway, Consolidated and Kingdom proposes to serve approximately 9,409 Unserved locations in 17 Census tracts in the proposed service area.

KTIS does not individually seek funding for a Broadband Experiment but supports the collaborative and individual Expression of Interest letters file by Callaway Electric and Consolidated Electric.

Kingdom Technology Solutions Inc.

A handwritten signature in black ink, appearing to read 'Tom Young', with a stylized flourish at the end.

Tom Young
President